

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DAMILARE SONOIKI,

Plaintiff,

v.

HARVARD UNIVERSITY, et al.,

Defendants.

Civil Action No. 1:19-cv-12172-LTS

**DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF PLAINTIFF'S EXPERTS
STEVEN D. SHEDLIN, CHAD L. STALLER, AND STEPHEN M. DRIPPS**

Defendants Harvard University, Harvard University Board of Overseers, and the President and Fellows of Harvard College ("Harvard")¹ hereby move the Court to exclude in its entirety the testimony of Plaintiff's experts Steven D. Shedlin, Chad L. Staller, and Stephen M. Dripps. As further explained in the accompanying Memorandum of Law in Support of Harvard's Motion, the Motion should be granted because Plaintiff's experts' fail to satisfy the requirements of Federal Rules of Evidence 702 and 703. Harvard respectfully requests that the Court exclude the opinions of Plaintiff's proffered experts prior to the parties' May 31, 2023, deadline to move for summary judgment. Harvard intends to raise several causation and damages-related issues on summary judgment, and a resolution to the Motion prior to summary judgment will permit the parties to address those issues efficiently and consistent with the scope of evidence to be considered by this Court at summary judgment and/or at trial.

¹ Plaintiff's Complaint incorrectly identifies the Harvard entities as "Harvard University, Harvard University Board of Overseers, and the President and Fellows of Harvard College." The President and Fellows of Harvard College is the legal entity that comprises the various named defendants and is the only proper party to this litigation.

Dated: April 19, 2023

Respectfully submitted,

/s/ Anton Metlitsky

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Board of Overseers, and the President and
Fellows of Harvard College*

LOCAL RULE 7.1(a)(2) CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), Defendants' counsel conferred with Plaintiff's counsel on April 19, 2023, in an effort to resolve or narrow the issues presented in this Motion. Plaintiff's counsel indicated that Plaintiff does not assent to the relief requested herein.

/s/ Anton Metlitsky
Anton Metlitsky

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 19, 2023.

/s/ Anton Metlitsky
Anton Metlitsky